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February 9, 1999

To: File

Thru: Bob Davidson, Senior Reclamation Specialist, Team Lead, West Ridge Project RAD
Joe Helfrich, Permit Supervisor, Compliance

From: Peter Hess, Reclamation Specialist III PH

RE: Addendum to West Ridge PAP, Round 3, West Ridge Resources, Inc., West Ridge Mine, PRO/007/041, Folder #2, Carbon County, Utah

SUMMARY:

The Round 3 response to Round 2 deficiencies as addressed by this individual in the January 27, 1999 technical analysis failed to address that portion of the **OPERATION PLAN** as it relates to **MINING OPERATIONS AND FACILITIES.** This addendum will address the aforementioned.

TECHNICAL ANALYSIS:

OPERATION PLAN

MINING OPERATIONS AND FACILITIES

Regulatory Reference: 30 CFR Sec. 784.2, 784.11; R645-301-231, -301-526, -301-528.

Analysis:

General:

As indicated on pages 5-5, and 5-10 of the PAP, West Ridge Resources, Inc., is proposing to develop an underground coal mine in the area of the Book Cliffs coal region NW of Sunnyside, Utah. The surface facilities will disturb approximately 25 acres in "C" Canyon. The applicant is proposing to ship run-of-mine product via a newly constructed Carbon County road to a nearly rail loadout facility. Annual production forecasts are anticipated in the

vicinity of 3 million TPY; current leases estimate 20 million recoverable tons during the anticipated six year mine life. If additional State and Federal leases are procured, mine life could be extended to as high as twenty years, recovering an additional 27 million tons.

Type and Method of Mining Operation

West Ridge Mine will be developed by utilizing two continuous miner sections utilizing shuttle car/belt conveyor haulage. Head and tailgate entries, and ventilation bleeders will be developed using the same procedure, outlining the longwall panels. Upon completion of panel development, the applicant will move longwall machinery into place, and initiate high volume coal extraction. See pages 5-5 through 5-11 of the PAP.

Standard, accepted engineering practices will be used to construct, develop, extract, and reclaim the mine site.

All surface facilities within the "C" Canyon disturbed area will be reclaimed, with the exception of approximately 1000 feet of Carbon County road which will remain, as part of the approved post-mining land use. All man made materials will be disposed of in acceptable disposal areas. "C" Canyon will be returned to its pre-mining surface configuration by back-hauling all fill material either into the underground entries or to the fill's original borrow area.

The status of the reclamation requirements for certain other facilities which will be built to service the mine (i.e., the 49 KVA power line, the six inch water line, and the telephone communications lines) is unknown, as same will cross lands owned by SITLA, BLM and private ownership. These lands are generally outside of the Mine's permit area, ungoverned by SMCRA or the State of Utah R645 coal mining rules.

Facilities and Structures

Dams, Embankments and other Impoundments

The impoundments at the site will consist of a dual cell (in series) sedimentation pond to collect and treat all disturbed area runoff above the mine office parking area, and a small catch basin to treat the parking area runoff (ASCA "Z"). The embankments associated with same will be designed, constructed, and maintained using current, prudent engineering practices as mandated by the R645 coal rules.

There are no dams, slurry cells, or refuse embankments associated with the West Ridge Mine.

Overburden and Topsoil Handling and Storage Areas and Structures

This is an underground coal mining proposal; there will be no overburden removal.

The applicant is proposing to implement an experimental practice regarding the topsoil which exists within the disturbed area perimeter. That practice will be to protect the in situ material in place using geotextile fabric, and then revitalize same upon removal of the overlying fill material. The approval of this experimental practice prior to implementation rests with the U. S. Department of the Interior, Office of Surface Mining.

Two small topsoil storage areas have been permitted in the upper reaches of the left and right hand forks of "C" Canyon.

Coal Removal, Handling, Storage, Cleaning, and Transportation Areas and Structures

Coal removal will be achieved by underground longwall methods, utilizing continuous miner/shuttle car/conveyor haulage to develop the longwall panels. An annual production rate of 3 million tons per year is forecast.

Run-of-mine coal will be conveyed to the outside, where it will be temporarily stored in an open stockpile in the left hand fork of "C" Canyon. Reclaim facilities will reload the stockpiled coal onto an automated truck loading conveyor. The trucks will then transport the run-of-mine product to a rail loading facility via County and State roads.

As indicated, the permittee anticipates that only run-of-mine coal will be shipped from the facility; there will be no wet processing. The facility will probably have a small crusher for chunk reduction for the purpose of preventing blocked transfers.

Spoil, Coal Processing Waste, Mine Development Waste; Noncoal Waste Removal, Handling, Storage, Transportation Areas and Structures

This is an underground mining proposal; no spoil will be generated.

Only run-of-mine product is being anticipated; no coal processing waste will be generated.

The applicant anticipates that there will be very little mine development waste generated during the face up of the portal area. Any material that is produced from roof-fall cleanup, overcasts, or belt transfer construction can be stored underground. However, should it be

necessary for mine development waste to be removed from the Mine, the applicant has permitted two temporary waste rock storage sites within the "C" Canyon disturbed area. The PAP is proposing that the material which will be temporarily stored in these areas will then be hauled and permanently disposed of within the DOGM permitted waste rock facility at the Wildcat Rail Loadout facility near Consumers.

Noncoal waste which is generated underground and on the surface will be collected, and temporarily stored in metal dumpsters strategically located within the disturbed area. It will then be hauled off of the permit area and permanently disposed of in a State permitted land fill. This paragraph is relative to combustible wastes only.

The PAP addresses the disposal of solid, noncombustible waste, (i.e., abandoned mining machinery) as being "placed and stored in a controlled manner in a designated portion of the "permit" area." Abandoned mining machinery is classified as noncoal waste under R645-301-528.331.

Page 5-36 makes the commitment that "final disposal of noncoal mine waste will be in a State-approved solid waste disposal site such as ECDC."

Page 5-36 also commits to proper handling and disposal of any "noncoal mine wastes" classified as "hazardous" under RCRA and 40 CFR Part 261.

The minimum regulatory requirements for disposal of noncoal waste have been met. There will be no noncoal waste disposal areas within the surface disturbed area of the West Ridge Mine facilities area.

Mine Facilities

The West Ridge Mine will consist of the following facilities located within the "C" Canyon disturbance:

1) Mine office and parking area
2) A two cell in series sedimentation pond
3) An electrical substation which will step down 49 KVA to appropriate mine voltages
4) Warehouse facilities including lubricant and fuel storage
5) Maintenance shop facilities
6) Open storage facilities for bulk materials (i.e., roof bolts, rock dust, machinery, etc.)

7) Bath house facilities (2)
8) Mine ventilation fan
9) Explosive and blasting cap storage facilities
10) Conveyor systems, coal crushing, storage and reclaim facilities as well as truck loading facilities
11) Lamp house
12) Culinary water storage
13) Noncoal waste storage facilities
14) Undisturbed by-pass culvert through the facilities area
15) Mine portals

Water Pollution Control Facilities

The water pollution control facilities at the West Ridge Mine will consist of the following:

1) The undisturbed bypass culvert through the mine site disturbance.
2) The two cell in series mine site sedimentation pond.
3) Two ASCA's associated with the topsoil storage areas in the upper reaches of the left and right hand forks of "C" Canyon.
4) One ASCA associated with the Mine office/parking area.

It should be noted that as of 2/9/99, there is no treatment facility in place for the UPDES outfall #2, (mine water discharge point to the "C" Canyon drainage via the undisturbed by-pass culvert).

Findings:

The permit application package meets the minimum regulatory requirements of the R645 rules relative to **MINING OPERATIONS AND FACILITIES.**

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